

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WRI PALOMINO TRACE INVESTORS, L.P., a	)	
Washington partnership	)	
	)	
Plaintiff,	)	
v.	)	No. 08 CV 4180
	)	
PALOMINO TRACE LLC; GV DEVELOPMENT LTD,	)	
LARGO PARTNERS II LLC, GEORGE VENTUTELLA	)	
and TERRI VENTURELLA,	)	Judge Holderman
	)	
Defendants.	)	

**MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES the Defendant, GEORGE VENTUTELLA, by and through his attorneys, Cornelius P. Brown of COHON RAIZES & REGAL LLP, and for his Motion for Extension of Time to Answer or Otherwise Plead, states as follows:

1. On July 23, 2008, Plaintiff filed its Complaint alleging one count of breach of contract against Defendants.
2. Defendant George Ventutella was served with Summons and Complaint on or about August 5, 2008. Defendant's counsel was not in receipt of the Summons and Complaint until recently.
3. Defendant's counsel will need additional time to investigate and review documents in order to prepare a defense in this matter and to determine whether counsel may provide representation to the other defendants.
4. Defendant's counsel has contacted Plaintiffs' counsel to determine if Plaintiffs' counsel objects to Defendant's request. While Plaintiffs' counsel is agreeable to extending

Defendant additional time to answer or otherwise plead, Plaintiffs' counsel is only willing to give Defendants eighteen days rather than twenty-one days and requires that Defendant agree not to seek further extensions. *See the email exchange between counsel on August 25, 2008, attached hereto as Exhibit A.* Since Defendant's counsel is investigating conflicts, Defendant's counsel cannot agree to such limitations.

5. Plaintiffs will not be prejudiced by this extension of time as no discovery deadlines or trial dates have been set.

6. Defendant is seeking similar relief on behalf of the other Defendants.

WHEREFORE, the Defendant George Ventutella respectfully requests this Honorable Court: (A) to grant him an extension of time of twenty-one (21) days within which to file an Answer or otherwise plead, (B) to grant the other Defendants twenty-one (21) days to appear and file their Answer or otherwise plead, and (C) for such other and further relief as this Honorable Court deems just.

Respectfully submitted,

By: /s/ Cornelius P. Brown

Cornelius P. Brown (ARDC No. 0312355)  
Carrie A. Dolan (ARDC No. 6224808)  
Cohon Raizes & Regal LLP  
208 S. LaSalle Street, Suite 1860  
Chicago, Illinois 60604  
(312)726-2252

August 25, 2008

**Carrie A. Dolan**

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**From:** Cornelius P. Brown  
**Sent:** Monday, August 25, 2008 4:30 PM  
**To:** Carrie A. Dolan  
**Subject:** FW: WRI v. Palomino Trace, et. al.

See below.

COHON RAISES & REGAL LLP

By: Cornelius P. Brown  
 208 S. LaSalle, Suite 1860  
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**From:** Cornelius P. Brown  
**Sent:** Monday, August 25, 2008 4:29 PM  
**To:** 'Feinstein, Faye B.'  
**Subject:** RE: WRI v. Palomino Trace, et. al.

Given the holiday, I think the 15th of Sept. is more appropriate. Also, since I am still evaluating which defendants I can represent from a conflicts standpoint, I can't agree that the order say "no further extensions will be granted." We will proceed with a motion. Thanks for your efforts.

COHON RAISES & REGAL LLP

By: Cornelius P. Brown  
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**From:** Feinstein, Faye B. [mailto:FBF@quarles.com]

8/25/2008

EXHIBIT A

**Sent:** Monday, August 25, 2008 4:24 PM  
**To:** Cornelius P. Brown  
**Cc:** Nachinson, Lauren N.  
**Subject:** RE: WRI v. Palomino Trace, et. al.

Please draft the Order giving all defendants - I assume you represent all, if not, please specify who you do represent - until the 12th of September. Also have the order expressly state that "no further extensions will be granted". Send me a draft as soon as you can. Thanks.

Faye B. Feinstein, Esq.  
 Quarles & Brady LLP  
 Citicorp Center  
 500 West Madison Street, 37th Floor  
 Chicago, Illinois 60661  
 Direct Dial: (312) 715-5069  
 Direct Fax: (312) 632-1723  
 E-mail: fbf@quarles.com

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**From:** Cornelius P. Brown [mailto:nbrown@cohonraizes.com]  
**Sent:** Monday, August 25, 2008 12:09 PM  
**To:** Feinstein, Faye B.  
**Subject:** RE: WRI v. Palomino Trace, et. al.

Fay,

I would ask for a 21 day extension given the holiday. Please let me know if you are agreeable.  
 Neal

COHON RAIZES & REGAL LLP  
 By: Cornelius P. Brown  
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**From:** Feinstein, Faye B. [mailto:FBF@quarles.com]  
**Sent:** Monday, August 25, 2008 10:08 AM  
**To:** Cornelius P. Brown  
**Cc:** Nachinson, Lauren N.  
**Subject:** WRI v. Palomino Trace, et. al.

Neal - as I mentioned in my voicemail to you this morning, I do not yet have any authority yet to give your clients an extension of their answer date. I am happy to request an extension, but am waiting to hear from you regarding your preference. As I told you, we are not inclined to give a long extension; my client is anxious to get this resolved.

Faye B. Feinstein, Esq.  
*Quarles & Brady*

8/25/2008

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8/25/2008